

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

NORTH JERSEY MEDIA GROUP INC., :

Plaintiff, :

-against-

**14 CV 7630**  
14 Civ.

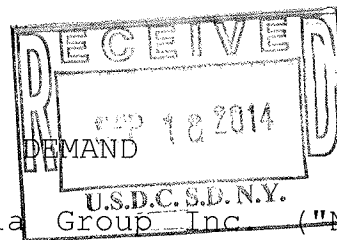
FOX NEWS NETWORK, LLC AND JOHN :

DOE NOS. 1 - 5, :

Defendants. :

- - - - - x

COMPLAINT AND JURY DEMAND



Plaintiff North Jersey Media Group Inc. ("NJMG"), by

its undersigned attorneys, for its complaint against defendants  
Fox News Network, LLC ("Fox News"), and John Doe Nos. 1-5  
alleges:

Nature of the Action

1. NJMG is bringing this action to enforce the  
copyright in its iconic photograph of three firefighters raising  
the American flag at the ruins of the World Trade Center site on  
September 11, 2001 (the "WTC Flag Raising Photograph").

Jurisdiction and Venue

2. This Court has subject matter jurisdiction over  
the claim in this action pursuant to 28 U.S.C. §§ 1331 and 1338  
because it arises under the Copyright Act, 17 U.S.C. § 101.

3. Upon information and belief, venue is proper in this District pursuant to 28 U.S.C. §§ 1391 and 1400(a).

4. Defendants are subject to the personal jurisdiction of this Court pursuant to C.P.L.R. § 301.

Parties

5. NJMG is engaged in the business of news reporting. NJMG is a corporation organized and existing under the laws of the State of New Jersey, with its principal place of business in Woodland Park, New Jersey. NJMG is the leading provider of news and marketing services in northern New Jersey. The Record and its sister publication, Herald News, are award-winning daily newspapers that reach nearly half a million readers a day with local, investigative and enterprise reporting. Forty-nine community newspapers circulate to 778,000 households across Bergen, Passaic, Essex, Morris, Hudson, and Sussex counties. Together, the company's daily and community newspapers reach 98% of homes across Bergen and Passaic counties.

6. Fox News is a limited liability company organized and existing under the laws of the State of Delaware with its principal place of business in the State of New York. John Doe Nos. 1-5 are employees or agents of Fox News, whose identities are not known to NJMG.

NJMG's Copyright

7. On or about September 11, 2001, an employee of NJMG, acting within the scope of his employment, took the WTC Flag Raising Photograph, a copy of which is annexed as Exhibit A. The WTC Flag Raising Photograph has become an iconic image that has received international attention. Because an employee of NJMG took the WTC Flag Raising Photograph while acting within the scope of his employment, it is a "work made for hire" as defined by § 101 of the Copyright Act. NJMG is therefore the sole owner of the copyright in the WTC Flag Raising Photograph.

Defendants' Infringing Acts

8. On or about September 10, 2014, defendants, their agents, or their employees, without permission, posted a copy of the WTC Flag Raising Photograph to the Facebook page they maintain for Bret Baier, the host of "Special Report with Bret Baier," on the web page [www.facebook.com/BretBaierSR](http://www.facebook.com/BretBaierSR) (the "Bret Baier Facebook page"), a copy of which is annexed as Exhibit B.

9. On September 15, 2014, NJMG, through its counsel, notified Fox News of the infringement by sending an e-mail to Dori Ann Hanswirth, Esq., and Nathaniel S. Boyer, Esq., Fox News' outside counsel.

10. As of September 19, 2014, Fox News has not removed the WTC Flag Raising Photograph from the Bret Baier Facebook page.

11. This is not the first time Fox News has made an unauthorized use of the WTC Flag Raising Photograph. On October 9, 2013, NJMG filed a complaint in this Court against one of Fox News' television personalities, Judge Jeanine Pirro, for infringing NJMG's WTC Flag Raising Copyright. The action is captioned North Jersey Media Group Inc. v. Pirro, 13 Civ. 7153 (ER). On February 20, 2014, acting on information Fox News provided, NJMG amended its complaint in that action to name Fox News as a defendant.

CLAIM FOR RELIEF

(Copyright Infringement - 17 U.S.C. § 501)

12. NJMG repeats the allegations in paragraphs 1 through 11 as if set forth in full.

13. NJMG owns, registered and received the United States Certificate of Copyright Registration No. VA 1-014-297 for the WTC Flag Raising Photograph ("WTC Flag Raising Copyright"). A copy of the certificate is annexed as Exhibit C.

14. NJMG's WTC Flag Raising Copyright is valid and enforceable.

15. Defendants have infringed NJMG's WTC Flag Raising Copyright in violation of 17 U.S.C. § 501 by using it to advertise and promote the "Special Report with Bret Baier" television program. Specifically, the web page, [www.facebook.com/BretBaierSR](http://www.facebook.com/BretBaierSR), advertised "Special Report with

Bret Baier" and embedded video clips from the show. The post that infringed NJMG's WTC Flag Raising Copyright featured the hashtags #FoxNews and #SpecialReport.

16. Defendants' acts have irreparably damaged and, unless enjoined, will continue to irreparably damage NJMG. NJMG has no adequate remedy at law for these wrongs and injuries. NJMG is, therefore, entitled to a preliminary and permanent injunction restraining and enjoining defendants, their agents, servants, employees, and attorneys and all persons acting in concert with them, from infringing NJMG's WTC Flag Raising Copyright.

17. Defendants have willfully infringed NJMG's WTC Flag Raising Copyright.

18. NJMG is entitled to recover damages sustained as a result of defendants' unlawful conduct including defendants' profits, or alternatively at NJMG's election, statutory damages.

WHEREFORE, NJMG demands judgment:

A. Preliminarily and permanently enjoining defendants, their agents, servants, employees, and attorneys and all those acting in concert with them from infringing NJMG's WTC Flag Raising Copyright in violation of 17 U.S.C. § 501;

B. Awarding NJMG its damages or defendants' profits, or alternatively, at NJMG's election, statutory damages, as a

result of defendants' infringement of NJMG's WTC Flag Raising Copyright;

C. Awarding NJMG its costs in this action, including its reasonable attorneys' fees pursuant to 17 U.S.C. § 505; and

D. Granting such other and further relief as to this Court seems just and proper.

Jury Trial Demand

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, NJMG hereby demands a trial by jury of all issues in this action that are so triable.

Dated: New York, New York  
September 19, 2014

DUNNEGAN & SCILEPPI LLC

By William Dunnegan  
William Dunnegan (WD0415)  
wd@dunnegan.com  
Richard Weiss (RW4039)  
rw@dunnegan.com  
Attorneys for Plaintiff  
North Jersey Media Group Inc.  
350 Fifth Avenue  
New York, New York 10118  
(212) 332-8300

## **Exhibit A**







## **Exhibit B**

9/11/2014

(4) Bret Baier

Bret Baier

Emily Home 20

Create Page

Recent

2014

2013

2012

2011

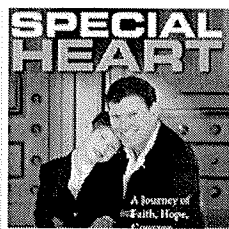
2010

Sponsored

Life Insurance?  
whatsmyneed.com



Life insurance now  
can help protect your  
child's future ability to  
be insured.



**Bret Baier**  
Public Figure

Like

Follow

Message

Timeline About Photos Likes Instagram feed

## PEOPLE

271,372 likes

Invite your friends to like this Page

## ABOUT

The only official Facebook page for Bret Baier,  
Anchor/Special Report with Bret Baier.

<http://www.bretbaier.com/>

Suggest Edits

## APPS

Instagram feed

## PHOTOS



LIKED BY THIS PAGE



Jenna Lee

Like



Bret Baier shared a link.  
about an hour ago

Politicians remember 9/11: <http://fxn.ws/1uxTwa8>



Politicians Remember 9/11 via Facebook | Special Report | Bret Baier | Fox News Channel  
[www.foxnews.com](http://www.foxnews.com)

President Obama is expected to outline his strategy for dealing with the ISIS threat during a 9pmET primetime address. Join us at 6pmET and 11pmET for a special edition of Special Report where we will preview and analyze the President's speech.

Chat (16)

Like · Comment · Share

62 people like this.



Write a comment...



Bret Baier  
6 hours ago

A South African judge says #OscarPistorius can't be convicted of murder but "no doubt" he acted unlawfully when he shot and killed Reeva Steenkamp.

Pistorius could still be convicted on other charges, including culpable homicide--

9/11/2014

(4) Bret Baier



Eric Shawn

Like

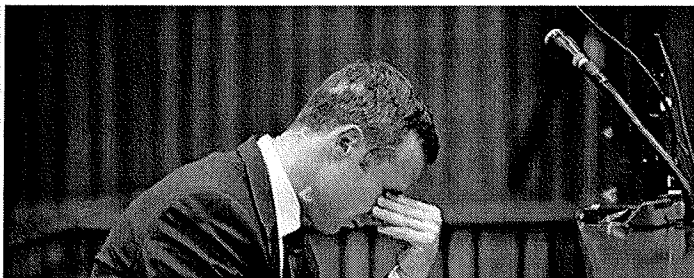


Jon Scott

Like

English (US) · Privacy · Terms · Cookies · Advertising · More

Facebook © 2014



Like · Comment · Share

4 Shares

107 people like this.

Top Comments



Write a comment...



Phyllis O'shaughnessy What a ridiculous verdict

Like · Reply · 18 · 6 hours ago



Flag Gazer Do sports figures ever really pay for their crimes?

Like · Reply · 15 · 6 hours ago



John A. Naguski Flag: Of course he or his family certainly paid this judge off.

Like · 2 · 4 hours ago



Write a reply...

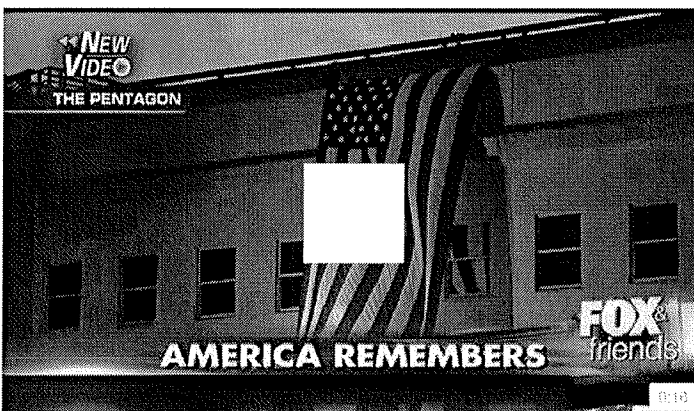
View 29 more comments



Bret Baier shared Fox News's video.

6 hours ago

This morning in Washington, D.C., the American flag was lowered over the Pentagon on the 13th anniversary of the 9/11 attacks.



Like · Comment · Share

1,803 people like this.

Top Comments



Write a comment...



Vickie McCarty ☐☐ God Bless America ☐☐

Like · Reply · 22 · 6 hours ago



Danielle Moffa very nice

Like · Reply · 8 · 6 hours ago

View 32 more comments



Bret Baier

17 hours ago

Today-- and every day--we remember each of the victims of #September11th terrorist attack and the heroes who risked everything to help.

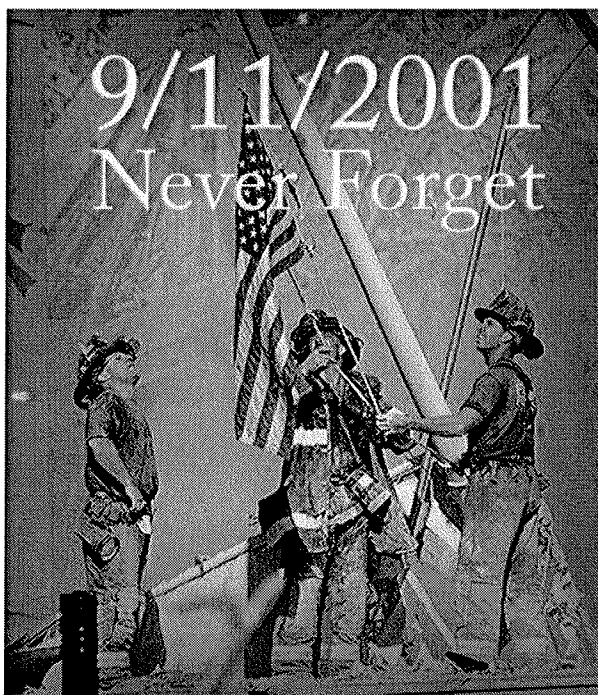
Comments and reactions are visible with all of the content affected by this update.

9/11/2014

(4) Bret Baier

Our thoughts and our prayers are with all of the families affected by that tragic day and with the entire nation.

#FoxNews #SpecialReport



Like · Comment · Share

4,220 Shares

1,526 people like this.

Top Comments



Write a comment...



Gordon Welt And just like the Alan Jackson song, "Where were you when the world stopped turning", I remember where I was, emotions, the news coverage, President Bush 43 on the pile, etc... Never let future generations forget

Like · Reply · 61 · 17 hours ago · Edited



Patrick Chmrr Mac Manus I was 12 years old, in bed, Mum was watching TV and saw the second plane hit live.... a horrible thing to see. My heart goes out always to those who lost a loved one.

Like · 11 · 8 hours ago



Write a reply...



Angie Pickle Dont forget the attack on American soil 9-11-12 Benghazi

Like · Reply · 56 · 17 hours ago



Paula Brantley Everyday I get up and the time is an 11. Could be 711,911,1111, well you get the point. I thought when I came to nyc last new year it would go away finally. But no it remains. I will never for get that day or today 9112014. God Bless America. God Bless the families of 911.

Like · Reply · 8 · 17 hours ago



Tatiana Nicholson ☐☐ Forever in our hearts!

United as one we will always never forget the innocent lives so many taken.....always remember 9/11, We pray for your peace as we remember the terrorism attacks.

God give us your strength to face the memory of this attack and the changes it made in our lives... God Bless America!

Like · Reply · 7 · 16 hours ago



Carole Layton Turchi Never will forget...

Like · Reply · 7 · 17 hours ago



Earlene Silver I don't see how any person in the United States who loves his or her country could ever forget 9-11-01 or the 9-11-12 in Benghazi!!

Like · Reply · 4 · 9 hours ago · Edited



Carolyn McMoran God bless America and those who love her ☐☐

Like · Reply · 3 · 10 hours ago



Carolyn Crabtree So sad will never forget.

Like · Reply · 3 · 10 hours ago



Inge Laux Collins yes we newer Forget

Like · Reply · 2 · 11 hours ago

9/11/2014

(4) Bret Baier



Alissa Marie Campbell It still makes me mad. Every American should STILL be angry. They should show footage of that day every single day.

Like · Reply · 2 · 17 hours ago



J. Terrell Butler I agree Alissa. And I get more and more angry a your government every day

Like · 1 · 11 hours ago



Write a reply...



Jack Jackson Thanks, Bret, for helping to bring clarity to all the confusion and horror going on around us. And thanks for being the dad and husband you are.

Like · Reply · 1 · 6 hours ago



Cherie Byrnes Never forgotten.

Like · Reply · 1 · 7 hours ago



Jean Dallen God bless.

Like · Reply · 1 · 7 hours ago



Shirley Nolen Prayers for all the families. I cried that day as I watched in disbelief.

Like · Reply · 1 · 7 hours ago



Karlina Stoney God bless all the men and women,there family's and the firefighters such a sad day xxxx

Like · Reply · 1 · 7 hours ago



Stan Kaplan Yes, we'll remember, but unless and until we have leaders that have the strength to do what's in the best interests of the people instead of their self interests, we will never be safe or reach our full potential.

Like · Reply · 1 · 8 hours ago



Zebbie Smith Still praying for all the families and praying for America and all the first responders as I did then!

Like · Reply · 1 · 8 hours ago



Nancy Kemler Tragic! I am still heart broken over this! May they all R I P

Like · Reply · 1 · 9 hours ago



Debbie Treadwell! Everett God bless each family! God bless America!

Like · Reply · 1 · 13 hours ago



Carol Guy we will never forget that day

Like · Reply · 1 · 15 hours ago



Doug Plank What's really sad is how many so-called Americans seem to have forgotten what happened and how much outcry there was EVERYWHERE to take revenge. Now those same people want to blame Bush for doing what the country as a whole wanted him to do. Pathetic.

Like · Reply · 1 · 15 hours ago



Brikko Bree Hayashi Amen!

Like · Reply · 1 · 16 hours ago



Judy Zandt I live that pic.

Like · Reply · 1 · 17 hours ago



Ben Sweeney Picture speaks a thousand words...The Public should acknowledge the towers falling everyday... It is the real Pledge of Allegiance...

Like · Reply · 3 · 17 hours ago



Steezy Stevie Never forget how for the first second and third time in history a high rise steel building was brought down at freefall speed due to fire

Like · Reply · 2 minutes ago



Shirley Hulsey Hanger A Day don,t think any one can ever Forget , God Bless America an All the Families

Like · Reply · about an hour ago



Raymond Harper Jr. Never will!

Like · Reply · 3 hours ago



Linda Bromund how can anyone who was alive ever forget that day???

Like · Reply · 4 hours ago



William King I honor the lives lost by investigating 9/11. The official story doesn't make sense.

<http://www.youtube.com/watch?v=3Zbv2SvBEec#t=840>

Like · Reply · 5 hours ago



Gram Gloria God bless the families who lost loved ones. Thankyou.4 their service. Gram gloria

Like · Reply · 6 hours ago



Michael Worsdell no 1 will forget what happened that day but for the love of god 13 yrs and america still go on about it ppl who lost loved 1s that day who werent americas but to bring it up every year is opening the wounds ppl try and forget but u american cant stop bringing this up ever year as it becoming a joke

Like · Reply · 6 hours ago



Linda Geraci Owen

Like · Reply · 7 hours ago



9/11/2014

(4) Bret Baier

-  **Nathaniel A Mack** 9/11/01 and 9/11/12 were both inside jobs, people. Wake up.  
Like · Reply · 7 hours ago
-  **Deborah Parsons-Burckhard** God Bless America!!!  
Like · Reply · 8 hours ago
-  **Marisa Lozano** Respect  
Like · Reply · 9 hours ago
-  **Bonnie Wright** amen  
Like · Reply · 9 hours ago
-  **Nick Simaym** Never Forget what you did in Vietnam you animals  
<http://vietnamartwork.files.wordpress.com/2011/05/boys.jpg>  
Like · Reply · 9 hours ago
-  **Alf Lederle** Foolish, an Israeli Funker told me, that these assaults were made by fascists that live in the Bible girdle of USA!  
Like · Reply · 11 hours ago
-  **William King** Question 9/11  
Like · Reply · 15 hours ago
-  **Fawn Emler** Thank you Bair  
Like · Reply · 15 hours ago
-  **Barbara Steman** Saner i was at work and was the first one to hear it and tell my fellow employees. i had a little radio i kept on low on my desk. when i heard that a plane had hit one of the twin towers, my first thought was not terrorism. when the second plan hit, a sunken feeling went thru my body. i pray it never happens again.  
Like · Reply · 1 · 8 hours ago
-  **Tim Terry** Never forget that day and all fellow Americans in shock watching innocent lives taken as the towers tumbled to the ground.  
Like · Reply · 1 · 12 hours ago
-  **Shannon IrishGirl** Marie I have friends who were first responders that went from searching for survivors to a recovery effort. The stories are so sad. We must never allow this to happen EVER again.  
Like · Reply · 1 · 15 hours ago
-  **Anita Venezia** The horrific event still shocks me ... Will never believe such a thing could happen to our beloved America...  
Like · Reply · 1 · 11 hours ago
-  **Denise Hysler** Conway Amen  
Like · Reply · 8 hours ago
-  **Donna Franer** <http://911review.org/Wiki/TwinTowers.shtml>  
Like · Reply · 5 hours ago

Write a comment...

**Bret Baier**  
19 hours ago

President Obama laid out a 4 point strategy for combating #ISIS--

A few other key points of the speech below-- Let me know your thoughts.



Like · Comment · Share

299 Shares

584 people like this.

Top Comments



Write a comment...

9/11/2014

(4) Bret Baier



Danni Habie Wyatt All he said was blah, blah,blah, I am not willing to really fight ISIS so lets just hope I am out of office before it all explodes.

Like · Reply · 96 · 19 hours ago

8 Replies · 6 hours ago



Beth Ann God help us

Like · Reply · 96 · 19 hours ago

1 Reply

[View more comments](#)

2 of 277



Bret Baier

20 hours ago

President Obama authorizes U.S. airstrikes in Syria, senior administration officials say, as the president uses a prime-time address to the nation to call for a comprehensive campaign to wipe out Islamic State.

Like · Comment · Share

18 Shares

351 people like this.

[Top Comments](#)



Write a comment...



Rose Helisek Hitchman but there was no emotion.....I wanted to see anger, fear....something!!!!

Like · Reply · 41 · 20 hours ago

8 Replies · 7 hours ago



Charles Frischknecht i am waiting for action before i believe his words

Like · Reply · 30 · 20 hours ago



Loreen Isaacs But wait, he said that ISIS is not Islamic. God help us

Like · 10 · 16 hours ago



Write a reply...

[View more comments](#)

2 of 136



Bret Baier

20 hours ago

Amazing photo via Gary Hershorn--NYC based photojournalist--on the eve of the 9/11 anniversary.

Fox News



Gary Hershorn

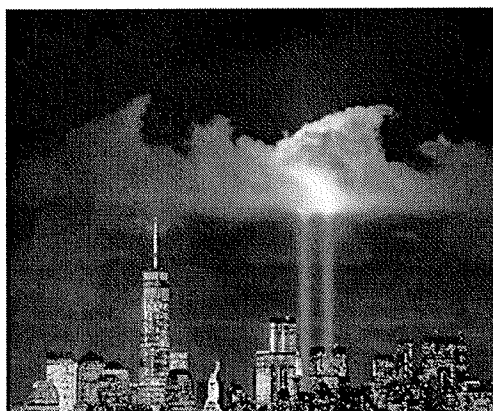
@GarryHershorn



Following


The annual Tribute in Light one night before the 13th anniversary of 9/11. #newyork #newyorkcity @nyc @newyork #1wtc

↳ Reply ↳ Retweeted ↳ Favorite ↳ More



9/11/2014

(4) Bret Baier




Like · Comment · Share


9,782 Shares

12,610 people like this.

Top Comments




Write a comment.



Mary Lou Parker let us never forget that horrible day in America's history.

Like · Reply · 259 · 20 hours ago

2 Replies




Susan Farmer Duckett Amazing!

Like · Reply · 110 · 20 hours ago

View more comments

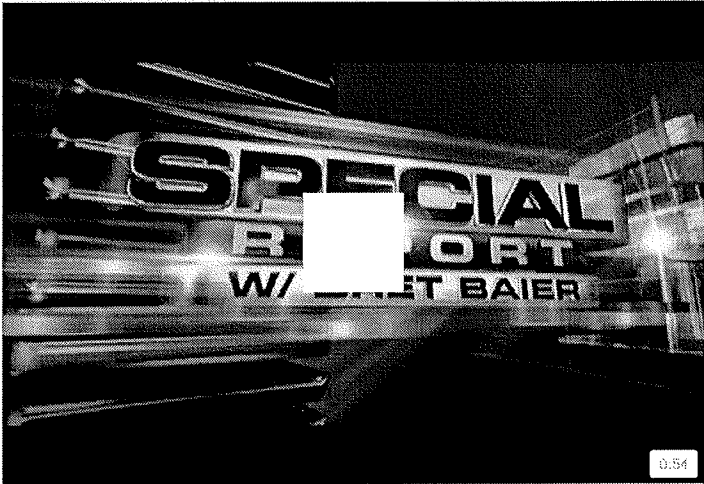
2 of 303



Bret Baier

21 hours ago

What is the biggest issue we are NOT talking about? The panel weighs in--  
#FoxNews #SpecialReport




0:54

Like · Comment · Share


75 Shares

722 people like this.

Top Comments




Write a comment.



Richard Quick The 49 Senate Democrats try to take away our First Amendment rights

Like · Reply · 34 · 21 hours ago

2 Replies · 2 hours ago



Eric Robinson Hmmmmm, well, Big Brother running rough-shod over the Bill Of Rights?

Like · Reply · 32 · 21 hours ago

2 Replies

View more comments

2 of 83

See More Stories ▾

https://www.facebook.com/BretBaierSR

7/7

## **Exhibit C**

Additional Certificate (17 U.S.C. 706)  
Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Maria A. Pallante*

Register of Copyrights, United States of America

**FORM VA**  
For a Work of the Visual Arts  
UNITED STATES COPYRIGHT OFFICE

VA 1-014-297



EFFECTIVE DATE OF REGISTRATION

10 05 2001  
Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

1

TITLE OF THIS WORK ▼

Three Firefighters Raising The American Flag on the Ruins of the World Trade Center

Photograph

PREVIOUS OR ALTERNATIVE TITLES ▼

Publication as a Contribution If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼ Number ▼ Issue Date ▼ On Page(s) ▼

2

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates of birth and death blank.

NAME OF AUTHOR ▼

a North Jersey Media Group Inc.

Was this contribution to the work a "work made for hire"?  
☒ Yes  
☐ No

Author's Nationality or Domicile  
Name of Country  
OR Citizen of New Jersey  
Domiciled in New Jersey

DATES OF BIRTH AND DEATH  
Year Born ▼ Year Died ▼

Was This Author's Contribution to the Work  
Anonymous? ☐ Yes ☒ No  
Pseudonymous? ☐ Yes ☒ No  
If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Check appropriate box(es). See instructions

☐ 3-Dimensional sculpture ☐ Map  
☐ 2-Dimensional artwork ☒ Photograph  
☐ Reproduction of work of art ☐ Jewelry design  
☐ Technical drawing  
☐ Text  
☐ Architectural work

NAME OF AUTHOR ▼

b  
Was this contribution to the work a "work made for hire"?  
☐ Yes  
☒ No  
Author's Nationality or Domicile  
Name of Country  
OR Citizen of  
Domiciled in

DATES OF BIRTH AND DEATH  
Year Born ▼ Year Died ▼

Was This Author's Contribution to the Work  
Anonymous? ☐ Yes ☒ No  
Pseudonymous? ☐ Yes ☒ No  
If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Check appropriate box(es). See instructions

☐ 3-Dimensional sculpture ☐ Map  
☐ 2-Dimensional artwork ☐ Photograph  
☐ Reproduction of work of art ☐ Jewelry design  
☐ Technical drawing  
☐ Text  
☐ Architectural work

3

a Year in Which Creation of This Work Was Completed

2001

b Date and Notice of First Publication of This Particular Work

Complete this information ONLY if this work has been published.

Month 9 Day 12 Year 2001

U.S.A.

4

See instructions before completing this space.

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

North Jersey Media Group Inc.  
150 River Street  
Hackensack, N.J. 07601-7172

Transfer If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

DO NOT WRITE IN THIS SPACE

APPLICATION RECEIVED

ONE DEPOSIT RECEIVED

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

MORE ON BACK ▼

• Complete all applicable spaces (numbers 6-9) on the reverse side of this page.  
• See detailed instructions.  
• Sign this form at line 8.

DO NOT WRITE HERE  
Page 1 of 2 pages



EXAMINED BY

5747

FORM VA

CHECKED BY

☐ CORRESPONDENCE  
Yes
FOR  
COPYRIGHT  
OFFICE  
USE  
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

☐ Yes ☒ No If your answer is "Yes," why is another registration being sought? (Check appropriate box.)
a. ☐ This is the first published edition of a work previously registered in unpublished form.b. ☐ This is the first application submitted by this author as copyright claimant.c. ☐ This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number

Year of Registration

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work; complete only 6b for a compilation.

a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates.

a  
See instructions  
before completing  
this space.

b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed.

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name

Account Number

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Please/Address/Apt/City/State/ZIP

Sally A. Steffen, Esquire

Ballard Spahr Andrews &amp; Ingersoll, LLP

1735 Market Street, 51st Floor

Philadelphia, PA 19103

Area code and daytime telephone number (215) 864-8222

Fax number (215) 864-8999

Email steffen@ballardspahr.com

CERTIFICATION\* I, the undersigned, hereby certify that I am the

check only one

☐ author☐ other copyright claimant☐ owner of exclusive right(s)☒ authorized agent of North Jersey Media Group Inc.

Not an author or other copyright claimant, or owner of exclusive right(s)

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Typed or printed name and date If this application gives a date of publication in space 3, do not sign and submit it before that date.

Sally A. Steffen

Date 9/28/01

Handwritten signature (X)

Certificate  
will be  
mailed in  
window  
envelope  
to this  
address:

Name

Sally A. Steffen, Esquire

Number/Street/Apt Ballard Spahr Andrews &amp; Ingersoll, LLP

1735 Market Street, 51st Floor

City/State/ZIP

Philadelphia, PA 19103

9

• Sign your application in space 8

1. Application fee

2. Non-refundable filing fee in check or money order payable to Registrar of Copyrights

3. Duplication material

Library of Congress  
Copyright Office  
101 Independence Avenue S.E.  
Washington, D.C. 20540-6000

As of July 1, 2000,  
the filing fee for  
Form VA is \$31.

17 U.S.C. § 606(a): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 408, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

June 1999—100,000

WEB REV: June 1999

PRINTED ON RECYCLED PAPER

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